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August 3, 2020

Commissioner Comer H. Randall
Public Service Commission of SC
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: Rulemaking Proceeding for the Purpose of Promulgating a Regulation to Help Prevent the Potential for Misleading Advertisements by Prohibiting the Sale of Customer Data by Regulated Utilities Absent a Customer's Direct Consent (See Commission Order No. 2019-877)
Docket No. 2019-387-A

Dear Commissioner Randall:

In regards to the proposed regulation submitted by South Carolina Office of Regulatory Staff (“ORS”) concerning privacy of utility customer data that the Public Service Commission of South Carolina is considering in this docket, Dominion Energy South Carolina, Inc. (“DESC”) previously submitted comments on March 12, 2020. (attached). In those comments, DESC suggested four amendments: 1.) that the regulation limit the proposed regulation to information that is identifiable to particular individuals or customers, not aggregated data where specific individuals or customers cannot be identified; 2.) that the regulation provide for certain additional disclosure exceptions; 3.) that the regulation allow for disclosure to law enforcement; and 4.) that the regulation not include a private right of action given the fact that multiple privacy statutes exist to cover these matters.

The revised draft of the regulation addresses DESC's concerns. The revisions will benefit customers by removing obstacles to providing emergency and storm damage response; processing customer assistance requests, claims and complaints; and providing appropriate cooperation to law enforcement and other matters. Thank you for your attention to this matter.

Respectfully submitted,

Womble Bond Dickinson (US) LLP



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cc: All parties of record